

# EXHIBIT 7

**KIRKLAND & ELLIS LLP**  
AND AFFILIATED PARTNERSHIPS

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July 10, 2018

***Via Electronic Mail***

Thomas E. Egler  
Robbins Geller Rudman & Dowd  
LLP  
655 West Broadway  
San Diego, CA 92101  
tome@rgrdlaw.com

Re: *In re National Prescription Opiate Litigation*, MDL No. 2804

Dear Tom:

I write on behalf of Defendant Allergan Finance, LLC (“Allergan Finance”) regarding Special Master Cohen’s June 30, 2018 Order regarding the provision of a “List of Prior Productions.” See Dkt. No. 693 at 7. An updated list is attached hereto as Exhibit A. This list includes all potential “prior production[s]” in “earlier litigation, investigation, or administrative action that touches upon the marketing or distribution of opioids” of which Allergan Finance is presently aware. While Allergan Finance has listed matters in which there may have been productions that relate to generic opioid medications, please note that all generic products, and all responsibility as well as liability for them, have been divested to Teva, and therefore to the extent their production is appropriate it should not be made through Allergan Finance.

Please let us know if you have any questions. Please also let us know if you believe there were any other such productions.

Regards,

/s/ Timothy W. Knapp  
Timothy W. Knapp

cc:

Donna M. Welch, P.C. (donna.welch@kirkland.com)  
Karl Stampfl (karl.stampfl@kirkland.com)  
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**KIRKLAND & ELLIS LLP**

July 10, 2018

Page 2

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## KIRKLAND &amp; ELLIS LLP

July 10, 2018

Page 3

Exhibit A

Production pursuant to subpoena and subsequent document requests in <i>City of Chicago v. Purdue Pharma L.P., et al.</i> , No. 1:14-cv-04361 (N.D. Ill.)	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to subpoena issued to Allergan Finance by the People of the State of New York on behalf of Alabama, Arizona, California, Colorado, Connecticut, Florida, Georgia, Hawaii, Idaho, Illinois, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nebraska, Nevada, New Jersey, New York, North Carolina, North Dakota, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Utah, Vermont, Virginia, West Virginia, Wisconsin, Wyoming, and the District of Columbia	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to subpoena issued to Allergan Finance by the Consumer Protection and Antitrust Bureau of the New Hampshire Department of Justice	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to Civil Investigative Demand issued to Allergan Finance by the Indiana Office of Attorney General's Consumer Protection Division	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to Civil Investigative Demand issued to	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>

## KIRKLAND &amp; ELLIS LLP

July 10, 2018

Page 4

Allergan Finance by the Missouri Attorney General's Office	
Production pursuant to Civil Investigative Demand issued to Allergan Finance by the Washington State Attorney General's Office	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to Civil Investigative Demand issued to Allergan Finance by the South Carolina Office of the Attorney General	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
Production pursuant to Request for Information issued by the Office of the Attorney General of Tennessee	<ul style="list-style-type: none"> <li>• Produced in the form agreed with Plaintiffs.</li> </ul>
2013 Subpoena from U.S. Attorney's Office	<ul style="list-style-type: none"> <li>• Related to suspicious order monitoring, the entities responsible for which were divested to Teva.</li> </ul>
<i>Finver v. Watson Pharmaceuticals, Inc., et al.</i> , D.C. Clark County, NV, A552182	<ul style="list-style-type: none"> <li>• Related to generic medications that are not among the medications referenced with respect to “Actavis” in the Track One Complaints.</li> </ul>
<i>Legacy Watson Generic Fentanyl Cases</i>  <i>E.g., Fontenot v. Watson Pharmaceuticals, Inc. et al.</i> , No. 10-cv-00162 (W.D. LA.)	<ul style="list-style-type: none"> <li>• Various cases involving Legacy Watson and generic fentanyl—not among the medications referenced with respect to “Actavis” in the Track One Complaints.</li> </ul>

KIRKLAND & ELLIS LLP

July 10, 2018

Page 5

<p><i>E.g., Klein v. Watson Pharmaceuticals, Inc. et al.</i>, No. BC-417869, Los Angeles County</p> <p><i>E.g., Standing v. Watson Pharmaceuticals, Inc., et al.</i>, No. 09-cv-00527 (C.D. Calif.)</p>	
<p><i>Legacy Actavis Fentanyl Litigation</i></p> <p><i>E.g., Boudreaux v. Actavis, Inc. et al.</i>, No. 3:12-cv-02644 (N.D. Tex.)</p> <p><i>E.g., Miragliotta v. Actavis, Inc. et al.</i>, No. 10-10389, Broward County, Florida</p> <p><i>E.g., Uricoechea v. Actavis, Inc., et al.</i>, No. 23116/2010, Kings County, New York</p>	<ul style="list-style-type: none"><li>● Various cases involving Legacy Actavis and generic fentanyl—not among the medications referenced with respect to “Actavis” in the Track One Complaints.</li></ul>